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May 12, 2020

The Honorable Sarah Netburn
United States Magistrate Judge
U.S. District Court for the Southern
District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: The Phillies v. Harrison/Erickson, Inc., et al., C.A. No. 19-7239-VM-SN

Dear Judge Netburn:

On behalf of Plaintiff The Phillies, I write to provide the Court with excerpts from recent depositions of Phillies witnesses that bear on the arguments made in the parties' respective letters concerning the Phillies' 30(b)(6) notice to the Harrison-Erickson Entities, and to which I may refer during tomorrow's discovery conference. The Exhibits are as follows:

- Exhibit A: Excerpts from Feb. 13, 2020 deposition of Tom Burgoyne
- Exhibit B: Excerpts from Feb. 28, 2020 deposition of Scott Brandreth
- Exhibit C: Excerpts from April 14, 2020 deposition of David Raymond
- Exhibit D: Excerpts from April 23, 2020 deposition of David Buck
- Exhibit E: Excerpts from May 7, 2020 Rule 30(b)(6) deposition (Scott Brandreth)
- Exhibit F: Excerpts from May 7, 2020 Rule 30(b)(6) deposition (David Raymond)
- Exhibit G: Excerpts from May 8, 2020 Rule 30(b)(6) deposition (David Raymond)

Respectfully,

/s/David J. Wolfsohn

David J. Wolfsohn

DJW/kah

cc: Paul D. Montclare, Esq. (by ECF)

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The Honorable Sarah Netburn

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